EXHIBIT 2

UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WAYMO LLC,

     Plaintiff,

vs.   No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

     Defendants.

_____/

WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GREGORY KINTZ

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 26, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2592507

PAGES 1 - 234

1	And in that Excel file, I computed the X/Y	12:08
2	separations using the Pythagorean theorem, as	12:08
3	previously discussed.	12:09
4	Q Okay. And the use of the Pythagorean theorem	12:09
5	to calculate separation, is that what you're calling	12:09
6	vertical separation in paragraph 33?	12:09
7	A The separation is the separation between the	12:09
8	individual components. The terminology of vertical,	12:09
9	yes, that is the separation between the	12:09
10	two components.	12:09
11	Q Okay. And I -- I just want to clarify.	12:09
12	So, earlier we were looking at the X/Y	12:09
13	coordinates for the GBr3.	12:09
14	Do you recall that?	12:09
15	A Yes.	12:09
16	Q By vertical separation, you're not talking	12:09
17	about just the delta or the difference between the Y	12:09
18	coordinates between two diodes then; is that correct?	12:09
19	A No. I was computing the -- both components.	12:09
20	Q Using both the X and Y coordinates?	12:09
21	A Yes.	12:10
22	Q And then there is this number ███████ ███	12:10
██ ██████████████████████		12:10
24	Do you see that in paragraph 33?	12:10
25	A Yes.	12:10

1	A	That is correct.	13:42
2	Q	Okay. And in order to calculate the vertical	13:42
3		spacing between A0 and A1, how would you calculate	13:42
4		that using the X/Y coordinates there?	13:42
5	A	The vertical spacing is related to its	13:42
6		position on the great circle relative to the lens.	13:42
7		And so I would take the difference in the X/Y	13:42
8		components and compute their separation, the	13:42
9		Pythagorean theorem.	13:42
10	Q	Is that something you could do now between A0	13:42
11		and A1?	13:42
12	A	Yes.	13:42
13	Q	Okay. What -- what is the vertical	13:42
14		separation between those two?	13:42
15	A	Do you have a calculator?	13:42
16	Q	We do.	13:42
17	A	Do you have a sheet of paper that I can write	13:42
18		on?	13:42
19	Q	Yes.	13:42
20	A	Do you have a pen that I can write with?	13:43
21	Q	Sure.	13:43
22	A	(Witness complies.)	13:43
23		I come up with ███████████, with	13:46
24		rounding to the third significant digit.	13:46
25	Q	And what does that number represent?	13:46

1   CERTIFICATE OF REPORTER

2

3   I, ANDREA M. IGNACIO, hereby certify that the

4   witness in the foregoing deposition was by me duly

5   sworn to tell the truth, the whole truth, and nothing

6   but the truth in the within-entitled cause;

7   That said deposition was taken in shorthand

8   by me, a disinterested person, at the time and place

9   therein stated, and that the testimony of the said

10   witness was thereafter reduced to typewriting, by

11   computer, under my direction and supervision;

12   That before completion of the deposition,

13   review of the transcript [ ] was [x] was not

14   requested. If requested, any changes made by the

15   deponent (and provided to the reporter) during the

16   period allowed are appended hereto.

17   I further certify that I am not of counsel or

18   attorney for either or any of the parties to the said

19   deposition, nor in any way interested in the event of

20   this cause, and that I am not related to any of the

21   parties thereto.

22   Dated: 4/27/2017

23

24   ANDREA M. IGNACIO,

25   RPR, CRR, CCRR, CLR, CSR No. 9830

                                        Page 234